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Attorneys for *Bayer CropScience Inc.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

SUNSET COMMERCIAL LLC, a Nevada  
Limited Liability Company,

Plaintiff,

vs.

BAYER CROPSCIENCE, INC., a New York  
Corporation; MONTROSE CHEMICAL  
CORPORATION OF CALIFORNIA, a  
Delaware Corporation; ATLANTIC  
RICHFIELD COMPANY, a Delaware  
Corporation; OLIN CORPORATION, a Virginia  
Corporation, TITANIUM METALS  
CORPORATION, a Delaware Corporation; LE  
PETOMANE XXVII, INC., an Illinois  
Corporation, in its representative capacity as the  
NEVADA ENVIRONMENTAL RESPONSE  
TRUST TRUSTEE; and the UNITED STATES  
OF AMERICA.

Defendants.

Case No. 2:23-cv-02081-GMN-BNW

**STIPULATION AND ORDER TO  
EXTEND DEADLINE FOR NON-  
SETTLING DEFENDANTS TO  
RESPOND TO PLAINTIFF'S MOTION  
TO ENTER CONSENT DECREE**

**(First Request)**

Defendants Bayer CropScience Inc., Montrose Chemical Corporation of California, a  
Delaware Corporation; Olin Corporation, a Virginia Corporation, Titanium Metals Corporation, a  
Delaware Corporation; Le Petomane XXVII, Inc., an Illinois Corporation, in its representative

capacity as the Nevada Environmental Response Trust Trustee (collectively, “Non-Settling Parties”) respectfully request that the Court extend the deadline for the Non-Settling Parties to file their responses to plaintiff Sunset Commercial LLC’s (“Sunset” or “Plaintiff”) Motion to Enter Consent Decree [ECF No. 114] by seven (7) days, from November 19, 2024 to November 26, 2024. Sunset consents to the requested extension. This is the first request to extend the deadline.

The Non-Settling Parties seek the requested extension to continue negotiations over the terms of a proposed Stipulation and Order with Sunset, the United States of America and Atlantic Richfield Company that, if successfully completed, would moot the need for the Settling Parties to oppose the Motion to Enter Consent Decree. Sunset has consented to the requested extension. The undersigned represent that this stipulation is not designed for purposes of delay.

IT IS SO STIPULATED.

DATED this 19th day of November 2024.

LATHAM & WATKINS LLP

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*Attorneys for Defendant Montrose Chemical Corporation of California*

DATED this 19th day of November 2024.

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*Attorneys for Defendant Olin Corporation*

DATED this 19th day of November 2024.

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DATED this 19th day of November 2024.

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*Attorneys for Defendant  
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DATED this 19th day of November 2024.

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*Attorneys for Defendant  
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DATED this 19th day of November 2024.

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*Attorneys for Defendant, Le Petomane XXVII,  
Inc., an Illinois Corporation, in its  
representative capacity as the trustee of the  
Nevada Environmental Response Trust*

IT IS SO ORDERED:

  
\_\_\_\_\_  
GLORIA M. NAVARRO  
UNITED STATES JUDGE

DATED: November 19, 2024